REMARKS

This Amendment is filed in response to the Final Office Action mailed September 29, 2008 and is herewith filed a Request for Continued Examination and the associated fee. All objections and rejections are respectfully traversed.

Claims 1-65 are in the case.

Claim 65 has been added.

Claims 30-31, 33, 38, 40, 46, 51, 53, and 59-64 have been amended.

Request for Interview

The undersigned respectfully requests a telephonic interview with the Examiner after the Examiner has had an opportunity to consider this Amendment, but before the issuance of the next Office Action. The undersigned may be reached at 617-951-2500.

Specification

At paragraph 6 of the Office Action, the specification was objected to for failing to provide proper antecedent basis for claim 38. Claims 38 has been amended and the specification is believed to be in condition for allowance. Support for the amendment (i.e., RAM [Random Access Memory]; non-volatile storage) may be found in Applicant's specification on page 4, lines 10-13.

Rejections Under 35 U.S.C. § 112

At paragraph 7 of the Office Action, the Examiner rejected claims 30-31, 33, 40, 46, 51, 53, 59, and 64 under 35 U.S.C. § 112, paragraph 2. Claims 30-31, 33, 40, 46, 51, 53, 59, and 64 have been amended, and are believed to be in condition for allowance.

Rejections Under 35 U.S.C. § 102

At Paragraphs 10 of the Office Action, claims 1-2, 4-5, 30-34, 36-40, 42-47, 49-53, 56-60, and 62-64 were rejected under 35 U.S.C. 102(e) as being anticipated by Chandrashekhar et al. U. S. Patent Publication 2005/0033988 published on February 10, 2005, (hereinafter "Chandrashekhar").

Applicant's claimed novel invention, as set out in representative Claim 1, comprises in part:

> 1. A method for establishing identity in a file system, comprising:
> receiving a file request concerning an indicated file from a client, the request received by a proxy;
> forwarding the request from the proxy to a file server;
> returning a reply associated with the file request from the file server to the proxy;
> *inserting*, by the proxy, *metadata into the file handle*; and
> *sending, by the proxy, the file handle with the metadata inserted in the file handle to the client,* the metadata to be used in further requests to identify the client and the indicated file.

Chandrashekhar discusses processing file requests sent by a client and received by a proxy using security applications to encrypt, decompress, verify, and decrypt network data by a server receiving the files from the proxy [0058; 0071]. Header policy information is determined, generated, and added <u>at the proxy server</u> and then <u>stored on the filer server</u> [0055; Fig. 4-5]. Metadata of the header policy information now being sent by the server back to the proxy is <u>stripped from the file</u> (by the proxy) <u>before the file is returned to the client</u> [<u>0038</u>; Fig. 8; 0055; 0069-0070].

Applicant claims *inserting…metadata into a file handle* and then having a proxy send *the file handle <u>with the metadata inserted in the file handle to the client</u>*.

Applicant respectfully urges that Chandrashekhar does not disclose Applicant's claimed novel *inserting…metadata into a file handle* and then having the proxy send *the file handle <u>with the metadata inserted in the file handle to the client</u>*.

As stated above, Chandrashekhar *removes the metadata* from the file data/file attributes (e.g., file handle) *before* returning the file to the client. This is in complete contrast to Applicant's claimed *sending, by the proxy, the file handle <u>with the metadata inserted in the file handle to the client</u>*.

Support for Applicant's characterization of Chandrashekhar can be found at Chandrashekhar paragraph [0038]:

> …The meta-data relates to key management, length of the original
> file/dataset, whether the file was compressed prior to encryption or not,
> integrity checks for file data. <u>The meta-data is stripped off</u> *before* <u>the file
> data/file attributes are returned to the client</u>…(emphasis added)

As such, Chandrashekhar makes absolutely no mention of Applicant's claimed *sending, by the proxy, the file handle <u>with the metadata inserted in the file handle to the client</u>*. Furthermore, Chandrashekhar stores header information on the file server [Fig 8]. This is completely different from Applicant's *inserting…metadata into a file handle*.

Accordingly, Applicant respectfully urges that the Chandrashekhar publication is legally precluded from anticipating the claimed invention under 35 U.S.C. §102 because of the absence from the Chandrashekhar publication of Applicant's claimed novel *inserting…metadata into a file handle* and then having the proxy send *the file handle <u>with the metadata inserted in the file handle to the client</u>*.

Rejections Under 35 U.S.C. § 103

At Paragraph 10 of the Office Action, claims 3, 35, 41, 48, 54-55, and 61 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chandrasekhar in view of Ohazama U. S. Patent 7,225,207.

Applicant respectfully notes that claims 3, 35, 41, 48, 54-55, and 61 are all dependent claims, and these dependent claims are dependent from independent claims which are believed to be in condition for allowance. Accordingly, claims 3, 35, 41, 48, 54-55, and 61 are believed to be in condition for allowance.

Additionally, noting the above cited reference, Chandrashekhar explicitly *teaches away* from Applicant's claimed ***sending, by the proxy, the file handle <u>with the metadata inserted in the file handle to the client</u>*** since Chandrashekhar *removes the metadata* from the file data/file attributes *before* returning the file to the client. As a result, Chandrashekhar is also legally precluded from being used as a 35 U.S.C. § 103 reference.

New Claims

New claim 65 was added and are believed to be in condition for allowance.

Applicant's claimed novel invention, as set forth in representative new claim 65, comprises in part:

> 65. A method for establishing identity in a file system,
> comprising:
> receiving a file request concerning an indicated file from a client,
> the request received by a proxy;
> forwarding the request from the proxy to a file server;
> returning a reply associated with the file request from the file
> server to the proxy;
> *inserting*, by the proxy, ***metadata into the file handle***; and

sending, by the proxy, the file handle with the metadata inserted in the file handle to the client, a size of the file handle set to a sum of a length of the server file handle and a length of the proxy metadata, the metadata to be used in further requests to identify the client and the indicated file.

Applicant respectfully urges that Chandrashekhar does not disclose Applicant's claimed novel *inserting…metadata into the file handle* and then *sending, by the proxy, the file handle <u>with the metadata inserted in the file handle to the client,</u> a size of the file handle set to a sum of a length of the server file handle and a length of the proxy metadata*.

As mentioned above, Chandrashekhar, because of its <u>stripping the metadata from the file before the file is returned to the client,</u> does not show Applicant's claimed *inserting…metadata into a file handle* and then having a proxy send *the file handle <u>with the metadata inserted in the file handle to the client</u>*. Accordingly, Applicant respectfully urges that the Chandrashekhar publication is legally precluded from anticipating Applicant's new claims under 35 U.S.C. § 102 or 35 U.S.C. § 103 because of the absence from the Chandrashekhar publication of Applicant's claimed novel *inserting…metadata into the file handle* and then *sending, by the proxy, the file handle <u>with the metadata inserted in the file handle to the client,</u> a size of the file handle set to a sum of a length of the server file handle and a length of the proxy metadata*.

All independent claims are believed to be in condition for allowance.

All dependent claims are believed to be dependent from allowable independent claims, and therefore in condition for allowance.

Favorable action is respectfully solicited.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

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